## James Kousouros

USDC SDNY DOCUMENT **ELECTRONICALLY FILED** DOC #: 2/28/2020 DATE FILED:

JAMES KOUSOUROS FOUNDER & PRINCIPAL

260 Madison Avenue, 22nd floor • New York, NY 10016 212.532.1934/212.532.1939 fax E-mail: James@kousouroslaw.com

EVAN M. ROCK SENIOR ASSOCIATE

Emma J. Cole LEGAL ASSISTANT

February 28, 2020

## Via ECF

Hon. Lorna G. Schofield United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Application Granted. Defendant Mullakandov's sentencing hearing is adjourned to April 21, 2020 at 11am. The parties' sentencing submissions shall be filed on or before March 30, 2020. The Clerk of the Court is directed to terminate the letter motion at docket number 590.

Dated: February 28, 2020 New York, New York

United States v. Mark Mullakandov, (17-CR-262) Re:

United States District Judge

Dear Judge Schofield,

This letter is respectfully submitted to request that the sentence currently scheduled before the Court on March 19, 2020 be adjourned for 30-days.

On November 18, 2019 we submitted our objections to the initial Presentence Investigation Report. As of February 28, 2020 we have not received a final Presentence Investigation Report. We have spoken with United States Probation Officer Robert Flemen, who has indicated that we will receive the final Presentence Report no later than the end of the day on March 2, 2020. The current deadline to file a sentencing submission on behalf of Mr. Mullakandov is March 2, 2020.

In light of this, and the undersigned's upcoming trial schedule, we respectfully request a 30-day adjournment of Mr. Mullakandov's sentence.

Assistant United States Attorney Andrew Thomas consents to the instant request.

Thank you for your courtesy and consideration.

Respectfully Submitted,
/s/
James Kousouros, Esq.

c.c.

Andrew Thomas, Assistant United States Attorney